UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

TETHER AND BITFINEX CRYPTO ASSET LITIGATION

Case No. 19 Civ. 9236 (KPF)

NOTICE OF PLAINTIFFS' MOTION FOR ISSUANCE OF A LETTER OF REQUEST

Plaintiffs Matthew Script, Benjamin Leibowitz, Jason Leibowitz, and Pinchas Goldshtein, by and through their undersigned counsel, hereby move, pursuant to the Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, Mar. 18, 1970, 23 U.S.T. 2555; 28 U.S.C. § 1781; Federal Rule of Civil Procedure 28; and this Court's inherent authority for an Order granting the relief requested in the attached memorandum of law; namely, that this Court (1) sign Plaintiffs' proposed Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (the "Letter of Request"), attached as Exhibit 1 to the accompanying Declaration of Laura M. King, (2) instruct the Clerk of Court to affix the Court's seal thereto, (3) instruct the Clerk of Court to transmit the Letter to , and (4) issue any other relief that may be just, necessary, and proper.

The grounds for this Motion are set forth in the accompanying memorandum of law.

Dated: New York, NY

July 19, 2023

Respectfully submitted,

By:

/_S/

Oscar Shine

Todd M. Schneider*
Matthew S. Weiler*
Mahzad K. Hite*
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, CA 94608

Emeryville, CA 94608 Tel: 415-421-7100

tschneider@schneiderwallace.com mweiler@schneiderwallace.com mhite@schneiderwallace.com Philippe Z. Selendy Andrew R. Dunlap Oscar Shine Laura M. King SELENDY GAY FL

SELENDY GAY ELSBERG PLLC 1290 Avenue of the Americas

New York, NY 10104 Tel: 212-390-9000

pselendy@selendygay.com adunlap@selendygay.com oshine@selendygay.com lking@selendygay.com

Interim Lead Counsel and Attorneys for Plaintiffs and the Proposed Class

^{*(}pro hac vice)